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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

ANIBAL RODRIGUEZ, et al., individually
and on behalf of all other similarly situated,

Plaintiffs,

vs.

GOOGLE LLC

Defendants.

Case No. 3:20-cv-4688-RS

**STIPULATION EXTENDING TIME TO
RESPOND AND [PROPOSED] ORDER**

Judge: Hon. Richard Seeborg

Court: Courtroom 3 – 17th Floor

Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiffs Anibal Rodriguez, et al. (“Plaintiffs”) and Defendant Google LLC (“Google”), hereby stipulate to the extension of the deadline for Google to answer or otherwise respond to Plaintiffs’ Third Amended Complaint by seven (7) days, from September 15, 2021 up to and including September 22, 2021.

Google and Plaintiffs (collectively, the “Parties”), by and through their respective counsel, hereby stipulate and agree to the following:

WHEREAS, on August 18, 2021, the Court issued an Order Granting in Part and Denying in Part Google’s Motion to Dismiss Plaintiffs’ Second Amended Complaint and granted Plaintiffs leave to amend (ECF No. 127);

WHEREAS, on August 31, 2021 the Parties filed a stipulation to extend Google’s deadline for filing an Answer to Plaintiffs’ Second Amended Complaint to September 22, 2021;

WHEREAS, on September 1, 2021 the Court Ordered Google’s deadline for filing an Answer to Plaintiffs’ Second Amended Complaint was September 22, 2021;

WHEREAS, on September 1, 2021 Plaintiffs filed their Third Amended Complaint for (1) Breach of Contract or, in the Alternative, Quasi-Contract (Unjust Enrichment); (2) Invasion of Privacy Act Violations, Cal. Penal Code § 631; (3) Violations of the Comprehensive Computer Data Access and Fraud Act (“CDAFA”), Cal. Penal Code §§ 502 *et seq.*; (4) Invasion of Privacy; (5) Intrusion Upon Seclusion;

WHEREAS, pursuant to Fed. R. Civ. P. 15(a)(3), Google’s deadline to respond to Plaintiffs’ Third Amended Complaint is September 15, 2021;

WHEREAS, the Parties, by and through their respective counsel of record, have agreed to extend Google’s deadline to respond to Plaintiffs’ Third Amended Complaint seven (7) days, from September 15, 2021 to September 22, 2021;

WHEREAS the Parties have previously sought extensions regarding responses to the Complaint, First Amended Complaint and Second Amended Complaint, the parties have not previously sought to extend the deadline to respond to the Third Amended Complaint; and

WHEREAS this requested extension will not affect the case schedule;

1 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the
2 parties to this action, and pursuant to Civil Local Rules 6-2 and 7-12, that Google's deadline to
3 respond to Plaintiffs' Third Amended Complaint is September 22, 2021.

4
5 DATED: September 13, 2021

6 By: /s/ Mark C. Mao

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Attorneys for Plaintiffs

DATED: September 13, 2021

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Attorneys for Defendant Google LLC

FILER'S ATTESTATION

Pursuant to Civil Local Rule 5.1, I attest that all signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized this filing.

DATED: September 13, 2021

WILLKIE, FARR & GALLAGHER LLP

/s/ Benedict Y. Hur

Benedict Y. Hur

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UNITED STATES DISTRICT COURT
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ANIBAL RODRIGUEZ, et al., individually and
on behalf of all other similarly situated,

Plaintiffs,

vs.

GOOGLE LLC

Defendants

Case No. 3:20-cv-4688-RS

[PROPOSED] ORDER

Pursuant to stipulation of the Parties, the Court hereby **ORDERS** that the deadline for Google to respond to Plaintiffs' Third Amended Complaint is September 22, 2021.

IT IS SO ORDERED.

Dated: _____

Honorable Richard Seeborg